

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

§

VS.

§

CRIMINAL NO. 4:21cr491

RHONDA SKILLERN-JONES
DEFENDANT

§
§
§

**MOTION TO AMEND UNOPPOSED ORDER FOR RETURN OF OF PASSPORT
AND PERMISSION TO TRAVEL OUT OF THE SOUTHERN DISTRICT**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

NOW COMES, **RHONDA SKILLERN-JONES**, Defendant in the above entitled and numbered cause, by and through her undersigned counsel, Cornel A. Williams, and respectfully moves this Court to order that her passport be returned immediately for purposes of traveling out of the Southern District of Texas to Accra, Ghana. In support thereof, the Defendant would show the following:

I.

On January 20, 2021, this Court signed an Order allowing the Defendant to travel to Accra, Ghana on March 3, 2023 and returning March 11, 2023.

On February 20, 2023, Defendant was advised that she would need to have her passport approved by the Ghanian Embassy prior to traveling. The closest Ghanian Embassy in the United States is located in Little Rock, Arkansas. The Defendant is requesting that she be allowed to retrieve her passport as soon as possible in order to mail it to the Ghanian Embassy in Little Rock, Arkansas for approval prior to her departing for Accra, Ghana on March 3, 2023.

V.

WHEREFORE PREMISES CONSIDERED, the Defendant prays this Court amend its order dated January 20, 2023, and allow the immediate release of her passport for the purpose of having it pre-approved for travel to Ghana by the Ghanian Embassy.

Respectfully submitted,

/s/ Cornel A. Williams

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Motion to Amend Unopposed Order for Return of Passport and to Travel out of the Southern District was delivered to all concerned parties via electronic notice.

/s/ Cornel A. Williams

Cornel A. Williams

CERTIFICATE OF CONFERENCE

I contacted the office of Robert Johnson, Assistant United States Attorney regarding this motion and the following occurred:

_____ **** he is unopposed to this request

/s/ Cornel A. Williams

_____ Cornel A. Williams

CERTIFICATE OF CONFERENCE

I contacted the office of Officer Sally Schmitt of Federal Pre-Trial Services via email regarding this motion and the following occurred:

Officer Schmitt stated that Ms. Skillern Jones is currently compliant with her conditions of release, however, her office takes no position on this request and defer to the court's discretion on the matter.

/s/ Cornel A. Williams

_____ Cornel A. Williams